

1 Alan L. Schlosser (#49957)
2 Michael T. Risher (#191627)
3 Linda Lye (#215584)
4 ACLU Foundation of Northern California
5 39 Drumm Street
6 San Francisco, CA 94111
7 (415) 621-2493; (415) 255-1478
8 aschlosser@aclunc.org,
9 mrisher@aclunc.org, llye@aclunc.org

10 Attorneys for Plaintiffs Kerie Campbell,
11 Marcus Kryshka, and ACLU-NC

12 RACHEL LEDERMAN, SBN 130192
13 Rachel Lederman & Alexis C. Beach,
14 Attorneys at Law
15 558 Capp Street
16 San Francisco, CA 94110
17 (415) 282-9300; fax (415) 285-5066
18 rlederman@2momslaw.com

19 *and additional counsel listed on pleadings*

20 Attorneys for plaintiffs Timothy Scott
21 Campbell et al.

22 UNITED STATES DISTRICT COURT

23 NORTHERN DISTRICT OF CALIFORNIA

24 TIMOTHY SCOTT
25 CAMPBELL, et al.,

26 Plaintiffs,

27 vs.

28 CITY OF OAKLAND, et al.

Defendants.

No. CV11-05498 RS

**STIPULATED REQUEST FOR AN ORDER
EXTENDING DATE FOR AMENDMENT OF
PLEADINGS, DECLARATION AND
~~PROPOSED ORDER~~**

Complaint Filed: Nov. 14, 2011

Trial Date: May 28, 2013

24 Whereas, this court set a deadline of June 30, 2012, for the parties to complete all
25 amendments to the pleadings;

26 STIP REQU FOR ORDER EXTENDING DATE FOR AMENDMT OF PLEADINGS
27 CAMPBELL, ET AL. V. CITY OF OAKLAND, CASE NO. CV11-05498 RS

Whereas all current parties agree that it would be most efficient to join all parties in one action, and additional time is needed to do so as more fully set forth in the attached declaration of plaintiffs' counsel;

THEREFORE, the parties through their respective counsel jointly request that the court extend the date for amendment of pleadings to August 1, 2012.

It is so stipulated.

Dated: June 8, 2012 /S/

Rachel Lederman
Attorneys for plaintiffs Scott Campbell, et al.

/S/

Linda Lye
Attorneys for plaintiffs ACLU-NC, et al.

/S/

William Simmons, Supervising City Attorney
Attorney for defendants

SIGNATURE ATTESTATION

I am the ECF User whose ID and Password are being used to file this stipulated request. In compliance with General Order 45, X.B., I hereby attest that Ms. Lye and Mr. Simmons have concurred in this filing.

Dated: June 8, 2012 /S/
Rachel Lederman

STIP REQU FOR ORDER EXTENDING DATE FOR AMENDMT OF PLEADINGS
CAMPBELL, ET AL. V. CITY OF OAKLAND, CASE NO. CV11-05498 RS

DECLARATION OF RACHEL LEDERMAN

I am an attorney admitted to practice before this court and the attorney of record for plaintiffs Timothy Scott Campbell, Mark McKinnie, and Michael Siegel.

As discussed at the Case Management Conference, plaintiffs' counsel represent approximately fifteen people who were injured during the two demonstrations at issue in this case. Because this matter was originally filed only two weeks after these events, in conjunction with an application for a Temporary Restraining Order, all plaintiffs and defendants were not named at that time. Each of the two events at issue involved a mutual aid operation by a large number of law enforcement agencies. Counsel have been working diligently to investigate and obtain discovery in order to ascertain the responsible parties and avoid unnecessarily naming government entity or individual defendants who do not bear responsibility. Due to the large volume of evidence involved, additional time is required to complete this process and prepare the amended pleadings.

I declare under penalty of perjury that the foregoing is true and correct. Executed
this June 8, 2012, at San Francisco, California.

/S/
Rachel Lederman

STIP REQU FOR ORDER EXTENDING DATE FOR AMENDMT OF PLEADINGS
CAMPBELL, ET AL. V. CITY OF OAKLAND, CASE NO. CV11-05498 RS

1 **[PROPOSED] ORDER**
2
3

4 Pursuant to stipulation, the court sets the following deadline for completion of
5 amendment of pleadings: August 1, 2012.
6
7

8 Dated: 6/11/12
9
10

11 
12 RICHARD SEEBORG
13 United States District Judge
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

STIP REQU FOR ORDER EXTENDING DATE FOR AMENDMT OF PLEADINGS
CAMPBELL, ET AL. V. CITY OF OAKLAND, CASE NO. CV11-05498 RS